



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JAN 29 1997

Vera C. Magee, Treasurer
Detroit Democratic Club - PAC
1642 First National Building
Detroit, MI 48226

Identification Number: C00321075

Reference: October Quarterly Report (7/18/96-9/30/96)

Dear Ms. Magee:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the

contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

-Be advised that you have used an incorrect committee identification number on the Summary Page of your report(s). Please file all future

reports and correspondence using your correct identification number, C00321075, to avoid potential errors in entering your reports onto the public record.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to be 'NE' followed by a stylized flourish.

Neil Evans
Reports Analyst
Reports Analysis Division

SCHEDULE A ITEMIZED RECEIPTS

 List separately and address
 for each category of fee
 General Assembly Page

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RECEIVED

11/8/98

Contributions from Political Committees

 Any information supplied from such Reports and Statements may not be used by any person for the purpose of soliciting contributions or for other purposes
 purposes, other than using the name and address of any political committee to solicit contributions from such sources.

Detroit Democratic Club P.A.C.

Name, State, Address and ZIP Code Comm to Re-Elect Judge Craig Strong 2144 Hyde Park Detroit, MI 48207	Name of Employer Wayne County, Mich.	Date (month, day, year) 7/29/98	Amount of Cash Received (See Period) \$850
Name <input type="checkbox"/> Party <input type="checkbox"/> Other <input checked="" type="checkbox"/> Other (see Third Quarterly (close of books Sept. 30, 1998))	Position Judge - Recorder's Court	Amount (month, day, year) \$850	
Name, State, Address and ZIP Code Comm to Elect Kwame Kanyatta 14046 Archdale Detroit, MI 48227	Name of Employer Operation Get Down	Date (month, day, year) 7/29/98	Amount of Cash Received (See Period) \$400
Name <input type="checkbox"/> Party <input type="checkbox"/> Other <input checked="" type="checkbox"/> Other (see Third Quarterly (close of books Sept. 30, 1998))	Position Owner Services Agent	Amount (month, day, year) \$400	
Name, State, Address and ZIP Code Comm to Re-Elect Judge John H. Gillis, Jr. 14377 Rutland Detroit, MI 48227	Name of Employer Wayne County, Michigan	Date (month, day, year) 7/29/98	Amount of Cash Received (See Period) \$850
Name <input type="checkbox"/> Party <input type="checkbox"/> Other <input checked="" type="checkbox"/> Other (see Third Quarterly (close of books Sept. 30, 1998))	Position Judge - 1st District Court	Amount (month, day, year) \$850	
Name, State, Address and ZIP Code Comm to Retain Judge Jeffrey G. Collins 1441 St. Antoine Detroit, MI 48226	Name of Employer Wayne County, Michigan	Date (month, day, year) 7/29/98	Amount of Cash Received (See Period) \$850
Name <input type="checkbox"/> Party <input type="checkbox"/> Other <input checked="" type="checkbox"/> Other (see Third Quarterly (close of books Sept. 30, 1998))	Position Judge - Recorder's Court	Amount (month, day, year) \$850	
Name, State, Address and ZIP Code Comm to Retain Darryl Redmond 18465 Bretton Detroit, MI 48223	Name of Employer Wayne County, Mich	Date (month, day, year) 7/29/98	Amount of Cash Received (See Period) \$400
Name <input type="checkbox"/> Party <input type="checkbox"/> Other <input checked="" type="checkbox"/> Other (see Third Quarterly (close of books Sept. 30, 1998))	Position Asst to County Executive	Amount (month, day, year) \$400	
Name, State, Address and ZIP Code Comm to Re-Elect David J. Szymanski 2 Woodward Ave, #1301 Detroit, MI 48226	Name of Employer Wayne County, Mich	Date (month, day, year) 7/29/98	Amount of Cash Received (See Period) \$850
Name <input type="checkbox"/> Party <input type="checkbox"/> Other <input checked="" type="checkbox"/> Other (see Third Quarterly (close of books Sept. 30, 1998))	Position Judge - Recorder's Court	Amount (month, day, year) \$850	
Name, State, Address and ZIP Code Comm to Retain Judge Harvey Tennen 615 Griswold, Suite 631 Detroit, MI 48226	Name of Employer Wayne County, Mich	Date (month, day, year) 7/30/98	Amount of Cash Received (See Period) \$850
Name <input type="checkbox"/> Party <input type="checkbox"/> Other <input checked="" type="checkbox"/> Other (see Third Quarterly (close of books Sept. 30, 1998))	Position Judge - Recorder's Court	Amount (month, day, year) \$850	
SUBTOTAL of Receipts This Page			\$3,050
TOTAL This Period (all pages) (do not include other)			

SCHEDULE A ITEMIZED RECEIPTS

Use separate schedule
for each category of fee
on separate pagePage **2** of **3**
PCN Line Number
11 (B)

Contributions from Political Committees

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee or Party

Detroit Democratic Club P.A.C.

Contributor's Name and Address

Citizens for Jewel Ware
4815 Iroquois
Detroit, MI 48214

Name of Employer

Wayne County, Mich.

Date Rec'd

7/31/96

Amount of Cash
Received

\$500

Receipt for

Third Quarterly (close of books Sept. 30, 1996)

Description - Where Cash
Contributed - 3rd Quarterly 1996

\$500

Contributor's Name and Address

Comm to Re-Elect Judge William J. Giovan
2 Woodward Ave. #1511
Detroit, MI 48226

Wayne County, Mich

6/1/96

\$850

Receipt for

Third Quarterly (close of books Sept. 30, 1996)

Description - Judge - 3rd Quarter Court

\$850

Contributor's Name and Address

Susan Borman Re-Election Comm
P.O. Box 43568
Detroit, MI 48243

Wayne County, Michigan

8/1/96

\$850

Receipt for

Third Quarterly (close of books Sept. 30, 1996)

Description - Judge - 3rd Quarter Court

\$850

Contributor's Name and Address

Comm to Re-Elect Wendy Cooley
P.O. Box 07412
Detroit, MI 48207

City of Detroit

8/1/96

\$850

Receipt for

Third Quarterly (close of books Sept. 30, 1996)

Description - Judge - 3rd Quarter Court

\$850

Contributor's Name and Address

Friends of Carl Levin
P.O. Box 47368
Oak Park, MI 48237

U.S. Government

8/15/96

\$350

9/27/96

\$1,150

Receipt for

Third Quarterly (close of books Sept. 30, 1996)

Description - U.S. Candidate - Democratic

\$1,500

Contributor's Name and Address

Comm to Retain Izetta F. Bright
17305 Muirland
Detroit, MI 48221

City of Detroit

8/15/96

\$500

Receipt for

Third Quarterly (close of books Sept. 30, 1996)

Description - Judge - 3rd Quarter Court

\$500

Contributor's Name and Address

Comm to Re-Elect Jeanette O'Banner
P.O. Box 21870 Owens
Detroit, MI 48221

City of Detroit

8/15/96

\$850

Receipt for

Third Quarterly (close of books Sept. 30, 1996)

Description - Judge - 3rd Quarter Court

\$850

SUBTOTAL of Receipts This Page

\$5,900

TOTAL This Period (last page 000 has a number 000)

SCHEDULE A

ITEMIZED RECEIPTS

Use separate spreadsheet
for each category of PDC
Complete necessary pages

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10/18/96

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10/18/96

Contributions from Political Committees

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Detroit Democratic Club P.A.C.

Full Name, Address and ZIP Code	City or County	Date (month, day, year)	Amount of Cash Received (by check)
Friends of Brian Zahra 1485 - 23rd St. Wyandotte, Mich 48192	Wayne County, Mich.	8/18/96	\$850
Occupation Judge - 3rd Circuit Court			\$850
Comm to Elect Judge Isidore B. Torres 1900 Penobscot Bldg. Detroit, MI 48226	Wayne County, Mich	9/18/96	\$850
Occupation Judge, Recorder's Court			\$850
Comm to Elect Beverly Kinde Walker to Treasurer of Wayne County P.O. Box 05343, Detroit, MI 48205	Inner City Sub Center	9/18/96	\$300
Occupation Community Assistant			\$300
Comm to Elect Robert L. McClinton 19380 Parkside Detroit, MI 48221	Private Practice	9/18/96	\$850
Occupation Attorney			\$850
Comm to Retain Judge Robert P. Young 1001 Woodward, 900 Federal Bldg. Detroit, MI 48226	State of Michigan	9/18/96	\$850
Occupation Judge, Court of Appeals-1st District			\$850
Volunteer Comm for Morris Hood, Jr. 8872 Cloverlawn Detroit, MI 48204	State of Michigan	9/30/96	\$500
Occupation State Rep-District 11 - Democrat			\$500
SUBTOTAL of Receipts This Page			\$4,200
TOTAL This Period (last page this box number only)			\$15,150

